

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Legacy IMBDS, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10852 (KBO)

(Jointly Administered)

**NOTICE OF FILING OF PROPOSED REDACTED VERSIONS OF
(I) OBJECTION OF IV MEDIA, LLC TO MOTION OF COMCAST CABLE
COMMUNICATIONS, LLC (A) TO COMPEL PAYMENT OF POSTPETITION
AMOUNTS OWED UNDER THE AFFILIATION AGREEMENT, (B) TO ENFORCE
THE SALE ORDER AND APA, (C) TO COMPEL IMMEDIATE ASSUMPTION OR
REJECTION OF THE AFFILIATION AGREEMENT, AND (D) FOR RELIEF FROM
THE AUTOMATIC STAY TO PERMIT COMCAST TO EXERCISE ITS RIGHTS AND
REMEDIES UNDER THE AFFILIATION AGREEMENT, INCLUDING
TERMINATION OF THE AFFILIATION AGREEMENT (II) EXHIBIT A TO THAT
MOTION, AND (III) THE DECLARATION OF CAVITT RANDALL
IN SUPPORT OF THAT MOTION**

PLEASE TAKE NOTICE that, on October 25, 2023, IV Media, LLC (“IVM”), by and through its undersigned counsel, filed the *Objection of IV Media, LLC to Motion of Comcast Cable Communications, LLC (A) To Compel Payment of Postpetition Amounts Owed Under the Affiliation Agreement, (B) To Enforce the Sale Order and APA, (C) to Compel Immediate Assumption or Rejection of the Affiliation Agreement, and (D) For Relief from the Automatic Stay to Permit Comcast to Exercise its Rights and Remedies Under the Affiliation Agreement, Including Termination of the Affiliation Agreement* [D.I. 642] (the “Objection”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE THAT IVM is filing herewith the *Motion of IV Media, LLC to (I) Authorize it to Redact and File Under Seal Certain Information Contained in the Objection of IV Media, LLC to Motion of Comcast Cable Communications, LLC (A) To Compel Payment of Postpetition Amounts Owed Under the Affiliation Agreement, (B) To Enforce the Sale Order and APA, (C) to Compel Immediate Assumption or Rejection of the Affiliation Agreement, and (D) For Relief from the Automatic Stay to Permit Comcast to Exercise its Rights and Remedies Under the Affiliation Agreement, Including Termination of the Affiliation*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); iMedia Brands, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors’ service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

Agreement, as Well as in Documents Supporting that Objection, and (II) Granting Related Relief (the “Motion to Seal”) with the Court. The Motion to Seal will seek authorization to file under seal the Objection, Exhibit A to the Objection, and the Declaration of Cavitt Randall in Support of the Objection (the “Randall Declaration”). The Motion to Seal will further seek authorization to publicly file redacted versions of the Objection, Exhibit A to the Objection, and the Randall Declaration.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Rule 9018-1(d) of the Court’s Local Rules of Bankruptcy Practice and Procedure, attached hereto as **Exhibit A** are proposed redacted versions of the Objection and Randall Declaration.

Dated: October 31, 2023
Wilmington, Delaware

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

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